

UNITED STATES DISTRICT COURT

for the
DISTRICT OF NEW JERSEY

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DISTRICT OF NEW JERSEY
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DAVID V. ALSTON

Civil Action No. 13-309 (SDW)

VS

KEAN UNIVERSITY,
DR. PHILIP H. WITT,
& SARAH D. BLOOD

COMPLAINT
LIBEL; FORGERY; OBSTRUCTION OF JUSTICE
CONSPIRACY TO COMMIT LIBEL, FORGERY,
AND OBSTRUCT JUSTICE
GENDER AND RACIAL DISCRIMINATION
EMOTIONAL DAMAGE
HARASSMENT
MENTAL ANGUISH

PARTIES

David V. Alston	302 Springfield Avenue, #2	Summit, NJ 07901
Kean University	1000 Morris Avenue	Union, NJ 07083
Dr. Phillip H. Witt	Somerville, NJ	
Sarah D. Blood	Winfield Park, NJ	

JURISDICTION

COUNTY OF UNION

CAUSE OF ACTION

Kean University's Vice President for Student Affairs, along with the Office of Student Conduct, have libeled me into a wrongful two-year suspension. Knowing that I had a case that would get me awarded damages based on the decision letter of my Student Conduct Hearing Officer alone when compared to the 3 hour videotape, when I filed my Notice of Tort Claim to the Tort Supervisor in Trenton, claiming personal injury, Joy Moskovitz, the Appeal Officer who denied my appeal, conspired with Walter Mack the Hearing Officer and together they completely forged my original decision letter in an effort to obstruct justice. This fraudulent decision letter is what was sent to the Tort Supervisor, of which I have a copy. Dr. Janice Murray-Laury, the Vice President for Student Affairs, also conspired with Joy and Walter because she was the one who e-mailed me the forged letter, supposedly as a duplicate, courtesy copying Michael Tripodi the School Counselor.

I needed another copy of my original decision letter that the third defendant and complainant Sarah Blood is courtesy copied on because I destroyed my original copy in a fit of anger after reading it through. When my appeal was denied I asked both Joy and Janice for another copy of my letter via e-mail. For over a week of consistently asking, neither of them, including Catricia Shaw who was my hearing facilitator, ever bothered to dignify me with a reply. I then e-mailed Mr. Tripodi and

confided in him about my frustration with Janice and Joy, at the time very suspicious of what I knew was going on. Mr. Tripodi contacted Janice and only then did Janice reply with a fraudulent letter on which Mr. Tripodi was courtesy copied. She never followed up with a hard copy like when I am being disciplined, because she knew that she was wrong. She is still in possession of the true authentic decision letter and I therefore deem her an arch criminal.

On June 25, 2012 Janice paid somewhere in the neighborhood of over \$4,000.00 dollars out of Kean University's funds to give Walter Mack's authentic and maliciously premeditated 10 page piece of written slander to Dr. Phil Witt to have me evaluated on, which met the fourth and final requirement for libel. She also refrained from including my appeal letter and personal statement for my Student Conduct Hearing. Mr. Mack made me out to be the type of crazy man that would actually warrant the evaluation of a forensic psychologist.

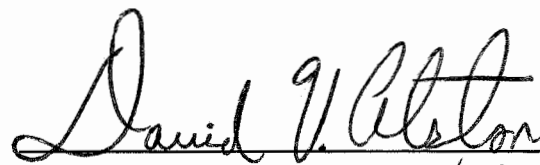
Worst of all, in the forged decision letter there are issues that Dr. Witt addressed with me during our time together that have since been omitted. All of this, on the part of Janice, Joy, and Walter to obstruct justice. Joy actually told some more lies on me in the forged letter.

I have lost time out of my life. In the hearing Walter declared, according to Student Conduct's policy, that he would have a decision rendered within 10 working days. He also informed Sarah that she had the right to appeal his decision if she did not like it. I could have completed the appeal process in time enough to apply to another university if my appeal was denied, if Walter rendered his decision according to policy, which should have been on May 4, 2012 because the hearing was on Friday, April 20, 2012. In an effort to destroy my life he violated both Student Conduct's policy and my student rights by having me wait for 29 working days before he signed my decision letter on May 29, 2012, knowing that I would lose the appeal and be too late to get into another school for the fall semester that has passed. During the waiting process I was harassed and oppressed by Janice and the Office of Student Conduct all into the summer session and could not concentrate on my studies during this time.

Lastly, I have not been allowed by Janice or Nicole Rodriguez, Director of the Office Student Conduct, to see or know anything about Dr. Witt's evaluation of me. The both of them have duplicate copies of his evaluation.

DEMAND

I demand a settlement out of court, which will include the immediate overturning of my suspension with all restrictions rescinded after my reinstatement, the revocation of Dr. Witt's evaluation of me, and damages in the amount of \$3,000,000.00 dollars. If I can make it happen, I desire to also sue Janice, Joy, and Walter as individuals, as I was advised that I can. Otherwise I would like to press the appropriate charges that will have Janice Murray-Laury, Joy Moskovitz, and Walter Mack prosecuted.


January 14, 2013